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EXHIBIT 19

APR - 3 2018



100 GROVE ST. | WORCESTER, MA 01605

April 2, 2018

PLANNING BOARD
GRAFTON, MA

Joseph Laydon
Town Planner
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**Subject: Leland Hill Water Tank - Wireless Telecommunications
29 Leland Hill Road
Special Permit and Site Plan Review**

Dear Joe:

We received the following documents on March 22, 2018:

- Correspondence from Prince Lobel to the Town of Grafton Planning Board dated February 28, 2018, re: Application for Special Permit with Site Plan Review, 29 Leland Hill Road.
- Bound document entitled Application to the Planning Board for a Special Permit with Site Plan Review for a Wireless Communication Facility for property located at 29 Leland Hill Road, Grafton, MA which includes the following plans:
- Plans entitled Leland Hill Water Tank, 29 Leland Hill Road, Grafton, MA 01757 (sic) last revised March 12, 2018, prepared by Hudson Design Group, LLC. (18 sheets)

Graves Engineering, Inc. (GEI) has been requested to review and comment on the plans' conformance with applicable "Grafton Zoning By-Law" amended through February 12, 2018; Massachusetts Department of Environmental Protection (MassDEP) Stormwater Handbook and standard engineering practices. As part of our review GEI visited the site on March 22, 2018.

Our comments follow:

Zoning By-Law

1. The bound application included a list of waiver requests (Tab 4). GEI understands that waiver requests will be addressed by the Planning Board. Please note, GEI does not have any civil engineering-related issues with the waiver requests.
2. On the cover sheet, the "proposed use" of the property should also specify that the property's existing use of a water storage tank will continue. (§1.3.3.3.d.4)
3. The Zoning Jurisdiction on the cover sheet must identify the zoning district of the project property (Medium Density Residential, aka R-20, and Water Supply Protection Overlay District). (§1.3.3.3.d.7)

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4. The locus was drawn at a scale of 1"=±58'. The locus map on the cover sheet should be drawn at a scale that allows the nearest street intersection (Main Street at Leland Hill Road) to be viewed to provide a nearby reference point. (§1.3.3.3.d.8)
5. The owners of the abutting properties must be identified on the plans in addition to the assessor's identification numbers (e.g. "N/F John Smith, 110/113.0-0000-0001.0"). The driveways of these abutting parcels must also be shown. (§1.3.3.3.d.11)
6. Construction-phase employee parking and loading areas must be shown on the plans. Employee parking must not occur on Leland Hill Road and unloading from Leland Hill Road must not occur to the extent possible. (§1.3.3.3.d.19)
7. The plans must specify the species or variety of arborvitae to be planted, the number of plantings, the spacing between plantings, and the minimum planting height when delivered to the site. (§1.3.3.3.d.21)
8. The proposed electrical and telephone connections must be shown on Sheet C-2. (§1.3.3.3.d.28)
9. The sediment and erosion controls shown on Sheet A-6 must be extended around the circular fence to protect the areas where trenching will occur to install the underground utilities. (§1.3.3.3.d.29)

Hydrology & MassDEP Stormwater Management

10. The proposed impervious surface area is minimal (±129 sq. ft.). As such, GEI has no issues relative compliance with MassDEP Stormwater Standards, provided that construction-phase erosion control devices are utilized to prevent sediment migration.

General Engineering Comments

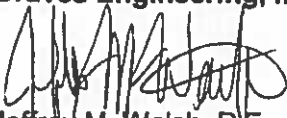
11. On Sheet GN-1, General Notes #18 and #19 do not appear relevant to this project, as this project is not an existing active cell site. Additionally, General Note #18 states that work should occur after midnight. Construction for this project must take place during normal business hours unless otherwise approved.
12. On Sheet A-1, the Tower Elevation Photo Detail shows the cable system on the west side (front) of the tank. A note should be added to this detail stating that the cable system will be located on the east side, and the photo is for illustrative purposes only.
13. On Sheet A-7, Construction Sequence note #4 states that areas of construction will be cut and stumped. The applicant has requested a waiver from showing existing vegetation, stating that existing vegetation will be unchanged. The Engineer should clarify and/or remove the note if it is not relevant.
14. On Sheet A-7, Construction Sequence note #9 references asphalt removal. It is not clear from the plans that any asphalt must be removed. Similarly, note #15 references construction of a tower foundation, but no tower is proposed on the plans. The Engineer should remove/revise these notes if they are not relevant.

General Comments

15. GEI did not review the structural or electrical information associated with the wireless telecommunications equipment. Such reviews are beyond the scope of this civil engineering-related site plan review.
16. The site's zip code is incorrectly stated as 01757 on Sheets T-1 and C-1 and on the title block of each sheet and must be corrected.

We trust this letter addresses your review requirements. Feel free to contact this office if you have any questions or comments.

Very truly yours,
Graves Engineering, Inc.



Jeffrey M. Walsh, P.E.
Vice President

Cc: Ricardo M. Sousa, Prince Lobel